

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE SEALED MATTER

NO. 12-86

MOTION TO SEAL

AND NOW, the United States of America, by its undersigned counsel, moves pursuant to Rule 6 of the Federal Rules of Criminal Procedure to file the documents accompanying this Motion under seal for the reasons set forth in the accompanying sealed declaration in support of the government's motion to seal.

WHEREFORE, for the foregoing reasons, the United States moves to seal this Motion and the above-referenced pleadings. For the convenience of the Court, a proposed form of Order is attached.

Respectfully submitted,

PETER J. SMITH
UNITED STATES ATTORNEY

/s/ WILLIAM A. BEHE

**FILED
HARRISBURG**

APR 4 - 2012

MARY E. D'ANDREA, CLERK

Per DEPUTY CLERK

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- ☐ Further Order of Court; or
- ☒ Written notification by the United States that these pleadings no longer need to remain filed under seal; or

☐ Arrest of defendant(s)

3. In support of this Motion, the United States alleges that filing these pleadings under seal is necessary in order to:

☒ Preserve the integrity of this ongoing case;

☐ Ensure the safety of investigative personnel;

☐ Protect the identity of potential witnesses;

☐ Allow for the seizure of evidence;

☒ Permit the arrest of those charged with violations of criminal laws; or

☐ Allow this defendant to complete the cooperation aspects of the plea agreement.

☐ Avoid unfair prejudice to the defendants

WHEREFORE, for the foregoing reasons, the United States moves to seal this Declaration and the above-referenced pleadings. For the convenience of the Court, a proposed form of Order is attached.

Respectfully submitted,

PETER J. SMITH
UNITED STATES ATTORNEY

/s/ WILLIAM A. BEHE

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